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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:15-CV-01221-MA

Plaintiff,

**COMPLAINT *IN REM* FOR
FORFEITURE**

v.

**ASSORTED PERSONAL PROPERTY,
COINS, JEWELRY, ACCESSORIES
AND OTHER THINGS OF VALUE, *in
rem*,**

Defendants.

Plaintiff, United States of America, by Billy J. Williams, Acting United States Attorney for the District of Oregon, and AnneMarie Sgarlata, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, Assorted Personal Property, Coins, Jewelry, Accessories and other things of value, further described as:

- a. **One Louis Vuitton men's garment bag;**
- b. **One Women's Rolex silver tone watch;**
- c. **Two Silver tone cuff links with "B" engraving;**
- d. **One Men's Breitling Bentley Continental GT silver watch;**
- e. **One Men's Tommy Bahama watch;**
- f. **One Men's 20 dollar gold coin "1904" watch;**
- g. **One Men's Rolex Submariner watch;**
- h. **One Davidoff gold lighter, S/N 1C9HK78;**
- i. **One Men's Rolex Daytona watch;**
- j. **One Men's Hermes toggle silver bracelet;**
- k. **One Men's Rolex President watch;**
- l. **One pair of Salvatore Ferragamo sunglasses;**
- m. **One Unisex Rolex Geneve Celini watch;**
- n. **One Men's gold tone bracelet with clear stones;**
- o. **One U.S. Eisenhower centennial silver dollar in case;**
- p. **Two U.S. Ellis Island Liberty coins in case;**
- q. **Two Unisex BMW cuff links;**
- r. **One Gold Initial "B" tie tack with clear stones;**
- s. **One Silver Initial "B" tie tack with clear stones;**
- t. **One Men's Rolex gold Geneve Celini watch;**
- u. **One Men's Rolex GMT Master watch;**
- v. **One Men's U.S. Polo Association watch;**
- w. **One Men's Silver Bulova Accutron Astronaut watch;**
- x. **One Men's gold ring with clear stones;**
- y. **One Women's gold ring with clear stones;**
- z. **One Italia tie tack;**
- aa. **One pair of Persol sunglasses;**
- bb. **One ¼ oz. gold coin;**
- cc. **One 1/10 oz. platinum coin;**
- dd. **One 2009 silver Liberty coin;**
- ee. **One pair of Cartier sunglasses with Jaguar Earpieces; and**
- ff. **One set of eleven (11) Callaway Golf clubs, including: one TaylorMade wedge, one Callaway wedge, one Cleveland wedge, two Scotty Cameron putters, all contained in a Callaway premium golf bag,**

are now, and during the pendency of this action, will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, as described above, constitute, or are derived from, proceeds of wire fraud in violation of 18 U.S.C. §1343 and are subject to civil forfeiture under 18 U.S.C. §981(a)(1)(C), as more particularly set forth in the declaration of Special Agent Cameron Wall, Internal Revenue Service-Criminal Investigations, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, Assorted Personal Property, Coins, Jewelry, Accessories and Other Things of Value, as further described above; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this.

Respectfully submitted this 2nd day of July 2015.

BILLY J. WILLIAMS
Acting United States Attorney

s/ AnneMarie Sgarlata
ANNEMARIE SGARLATA
Assistant United States Attorney

VERIFICATION

I, Cameron Wall declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Internal Revenue Service-Criminal Investigations, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/Cameron Wall

CAMERON WALL

Special Agent

IRS – CRIMINAL INVESTIGATION